

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
FRED LEE and ANN LEE,

Plaintiffs,

-against-

UNION MUTUAL FIRE INSURANCE COMPANY,

Defendant.  
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**NOTICE OF MOTION**

Case No.: 1:20-cv-03191 (MKB)(PK)

MOTION MADE BY:

GREENBLATT AGULNICK KREMIN, P.C., 55  
Northern Boulevard, Suite 302, Great Neck, New  
York 11021, attorneys for Plaintiffs, FRED LEE and  
ANN LEE

DATE, TIME AND  
PLACE OF HEARING:

On a day and time to be set by the Court, at the  
Thurgood Marshall United States Court House,  
United States District Court, 225 Cadman Plaza East,  
Brooklyn, New York, 11021, before Honorable  
Judge Margo K. Brodie.

SUPPORTING PAPERS:

Affirmation of Scott E. Agulnick, Esq., sworn to on  
the 25<sup>th</sup> day of October, 2021, the Affidavit of Fred  
Lee dated October 20, 2021, with attached exhibits,  
Plaintiffs FRED LEE and ANN LEE's  
Memorandum of Law, and all pleadings and  
proceedings has herein.

RELIEF DEMANDED  
AND GROUNDS:

(1) pursuant to F.R.C.P. § 56 granting Plaintiff  
summary judgment; and

(2) for such other and further relief as this Court  
deems just, equitable and proper.

TYPE OF ACTION:

Breach of contract

ORAL ARGUMENT:

Oral argument is not requested.

Dated: Great Neck, New York  
October 25, 2021

Yours, etc.,

GREENBLATT AGULNICK KREMIN, P.C.

By:                     /s/                      
Scott E. Agulnick, Esq.  
Todd D. Kremin, Esq.  
Attorneys for Plaintiff  
**FRED LEE and ANN LEE**  
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To:

Eric T. Boron, Esq.  
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